Letter O-15- California Chaparral Institute, Center for Biological Diversity, and Preserve Wild Santee

O-15-1 This comment is introductory and a summary of more detailed comments that occur later in the comment letter. No further response is required here.

O-15-2 The County acknowledges that the proposed Project is within a Very High Fire Hazard Severity Zone (VHFHSZ) and that reference to that fact should be included in the Project's Fire Protection Plan (FPP) (Dudek 2015). This reference is noted and will be added to Section 2.1 of the FPP. The County disagrees that the proposed Project presents a fire risk to existing communities or that the DEIR and/or FPP did not adequately analyze the potential adverse effects associated with providing fire protection for new developments in San Diego County. Fire behavior was analyzed correctly and was based on site-specific vegetation, terrain, and weather conditions, far more precise than the fire hazard severity delineations, which are on a rather coarse level. The FPP authors were aware that the area is within a VHFHSZ and that is what precipitated the FPP's detail and extensive fire protection measures. The Project's FPP meets the requirements for Determining Significance for Wildland Fire and Fire Protection (2010), and provides a layered approach to fire safety that is customized to the proposed Project and addresses the fire hazards specific to the site. The proposed Project will provide additional buffer for communities to the southwest and enhance the existing Otay Lake fire break by creating a large area of converted wildland fuels to managed, maintained landscapes and ignition-resistant/non-combustible structures/roads, respectively.

This type of dense development with an unbroken landscape (as opposed to low-density wildland urban intermix projects) has been found to perform well against wildfires (USGS Research 2015; IBHS Mega Fires 2008). Fire behavior has been analyzed, compared to similar fire environments, and accepted by County Fire Authority. While wildfires under extreme wind conditions can be unpredictable, the proposed Project has been designed with a layered system of protections and determined to include the necessary features to perform well during wildfires. The potential for Otay Lakes Road to be impacted by wildfire exists but has been determined a rare occurrence that would include contingency options for evacuation in wind-driven or typical weather fires. An evacuation plan that analyzes this potential, along with other potential situations, and develops contingency options is required by the Project's FPP (page 45) prior to any occupancy onsite and will provide for early evacuation and contingency when evacuation is not considered safe. This is consistent with current Office of Emergency Services (OES) emergency evacuation protocols. The type of wildfire described in the comment is a very rare event that would typically allow extended timeframes for evacuation, based on fire behavior modeling and fire spread rates (Dudek 2015), during which OES, law enforcement, and fire personnel would coordinate an orderly evacuation of the Project site well ahead of fire encroachment. Wind-driven fires rarely burn as depicted in the comment, with one wide flame front. A patchy firefront with ongoing burning behind the front would be likely. Fire behavior described in the comment within the fuels and terrain that occur at great distances from the Project's edge (northeast of the ridgeline of the Jamul Mountains) are accurate. However, the fire behavior at the Project edge is what would directly affect the Project's structures and what was the focus of the fire behavior modeling that informed the formulation of direct mitigation measures presented in the Project's FPP. Fire that eventually burns toward Otay Lakes Road, as described in the comment as severing the western evacuation route, is considered manageable. The area of concern is geographically in a flatter area with lower-density fuels that would result in less aggressive fire spread than described in the comment at some distance from the Project and includes Otay Lake to the east and west of Otay

Lakes Road as anchor points for fire operations. Fire retardant drops and ground forces along the northern portion of Otay Lakes Road would be able to contain a fire and provide for safe passage if necessary. However, it is unlikely that evacuations would be occurring in this "late" scenario as it would likely be determined in that situation that residents would be safer in their own well-protected homes (SD County Emergency Operations Plan, Annex Q – Evacuation). See Response to Comment A-4-149 for more information on evacuation.

O-15-3 The County disagrees with the comment that the presence of the Project will result in measurable differences in fire suppression tactics or the use of fire retardant in new areas adjacent to water supply. The Project provides additional wildfire buffer for some existing wildland urban interface (WUI) areas and to Otay Lake. This type of project, with a consistent landscape that excludes unmaintained native fuels within the development, performs very well against wildfire (USGS Research 2015) and results in an effective fuel break. The use of fire retardant already occurs during wildfires, and standard protocols guide where they can and cannot be used with due consideration for water supply. It is anticipated that the Project is designed to withstand significant wildfire, and the use of retardant drops at the southern side (nearest Otay Lake) of the Project is not anticipated as being necessary during wildfire events as these areas will be developed and native fuels removed (Dudek 2014). Additionally, the site's fire history indicates that fires do occur but include a significant number of years between fires. If retardant is used during a fire, it would likely be focused at the outer edges of the community, far away from Otay Lake and could be washed from the vegetation and leached into the ground. Fire retardant is comparable to a concentrated fertilizer, using ammonium phosphate. This mix can be diluted with water following the fire. Although retardant can, over time and with repeated applications, convert native habitats to grassland, repeated fire is far more effective converting habitat to grasslands, as has actually happened in large portions of San Diego County, and stresses the importance of controlling fires quickly, including through aerial resources, when possible. Fire suppression tactics are not likely to change measurably for wildfires, including large, wind-driven fires. The Project's WUI would not create additional need for resources but shifts the deployment of some resources to the east, although the Project, like most new communities in San Diego County, is designed to require minimal fire resource commitment through redundant layering of fire protection measures. The comment indicates that fires could be allowed to burn south to Otay Lake and this would change with the Project. In fact, fires would not typically be allowed to burn to Otay Lake for a variety of reasons, including habitat protection and water quality protection. Retardant drops would occur, hand/dozer lines would be constructed, and protection of assets would occur. The Project provides a buffer fuel break, extending the area to the north of Otay Lake that includes low probability of burning. Operations can occur to the north of the Project in the same way they occur now. For example, if it were considered necessary for protection of existing homes or the Project, backfiring from the edge of the Project Fuel Modification Zone would be a tool that is available with the Project, under conditions that would allow safe firing to occur. Reducing the WUI design of the Project, as indicated in the comment, would reduce the fuel break benefits that the Project provides. The comment indicates that fire retardant would be used in an area where it is not currently used, but provides no evidence to support this statement. Fire retardant is used strategically to contain wildfires and would likely be used in this area to minimize fire spread with or without the proposed Project. In fact, the Project minimizes the need for retardant drops adjacent Otay Lake because it presents a large, ignition-resistant landscape. If fire retardant is used near the Project site to minimize fire spread, the potential short-term plant/vegetation impacts is minimal compared to the complete consumption of the vegetation by fire and potential for erosion that could follow. Retardant is diluted and washed off by rain events and could be diluted and washed by the land manager, if concerned about potential impacts.

O-15-4 The EIR, Section 2.6, determines significant adverse impacts based on County Guidelines for Significance (2010, page 8). The analysis focuses on impacts to fire services pursuant to CEQA Section 15382 of the State CEQA Guidelines. The Guidelines state that a significant effect on the environment means a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air and water. For purposes of determining an environmental impact, CEQA states that an affirmative response to or confirmation of any one of the following Guidelines, will generally be considered a significant impact related to Wildland Fire and Fire Protection as a result of the project, in the absence of evidence to the contrary:

1. Criteria: The project cannot demonstrate compliance with all applicable fire codes.

   Project compliance: The Project has been determined to be in compliance with applicable fire codes.

2. Criteria: A comprehensive Fire Protection Plan has been accepted, and the project is inconsistent with its recommendations.

   Project compliance: The Project is consistent with the accepted Fire Protection Plan for this project.

3. Criteria: The project does not meet the emergency response objectives identified in the Public Facilities Element of the County General Plan or offer feasible alternatives that achieve comparable emergency response objectives.

   Project compliance: The proposed Project meets the general plan response objectives through the inclusion of a new fire station within the community that can respond to all portions of the Project site within the travel time standard.

As set forth in the DEIR, the Project does not trigger any of these criteria and is consistent with the San Diego County Guidelines for Significance. The Project FPP uses the standard Guidelines for Determining Significance for Fire Protection and, therefore, does not result in a significant impact on fire safety. Section 2.6.2.5 of the EIR contains the significance guidelines utilized in the analysis of the Project, as well as a rationale as to why those guidelines were chosen. In addition, the Project will be conditioned to provide for a new fire station onsite and will meet the County General Plan 5-minute travel time, as well as support a regional wildland fire strategy. Based on the Project meeting these guidelines and providing a layered, redundant fire protection system, and the mutually beneficial continuation of a mutual aid agreement with the City of Chula Vista, there are no identified unmitigated adverse impacts associated with fire protection. The comment quotes the FPP's limitations language, which is standard legal language for a professional document. This language is not meant to acknowledge Project vulnerability to fire so much as to indicate that the system will provide protection if maintained to the levels required. The Resort Village fire protection system will be maintained by the HOA for common areas and fuel modification areas, and the HOA monitors and enforces exterior structure maintenance. See Global Response 5: Determining Adequacy of Response/NFPA 1710 for more detail.

O-15-5 The County and the applicant team has prepared an evacuation program for the project (Appendix D- 21A of the Final EIR_). The Project satisfies the access requirements of the County code, including road widths, secondary access, dead end road lengths, looped roads, parking areas, and others. The Project has been designed to enable fire access throughout the site and enable community evacuation. The evacuation program will consider additional details regarding early evacuations and contingency plans when early evacuation is not possible. A Wildland Urban

Interface (WUI) Plan will be created for the Project site, which provides detailed information on evacuation during a wildfire. See Responses to Comments A-4-149 and O-15-2 for more information on evacuation.

O-15-6 The County disagrees that the proposed Project has not considered the safety issues identified in the comment. The overall fire analysis represented in the FPP prepared for the proposed Project considers the important project planning level issues related to fire protection. Responses to questions related to the FPP are provided below.

Many good questions are asked regarding the evacuation plan. There is no County requirement that an evacuation plan be prepared for projects, nor do FPPs typically include evacuation plans. Evacuation planning is conducted by multiple County and local agencies and when done on a project-specific level, needs to include general evacuation planning concepts because each emergency is fluid and relies on situational decision making. It is not possible to model or predict all of the potential scenarios that could result in evacuations and County OES and other emergency agencies have pre-plans in place to respond to emergencies involving evacuations. These pre-plans are updated to include changing conditions, like the Project. Because of this agency-centered evacuation approach, the Project's evacuation plan will address concepts that residents and visitors will need to be familiar with, such as primary evacuation routes, fire safety, and the "Ready, Set, Go"! practices, but will be prepared at a later date, before residents are onsite, and the comment's questions will be addressed, as appropriate. Please refer to Response to Comment O-15-5 for details on the CPEP content and format that will result in an evacuation plan consistent with San Diego County standards.

Responses to Questions: (1) Comment is correct on estimated number of residents, guests, and staff. (2) through 4) A full analysis will be provided in the proposed Project's evacuation plan. 5) Appendices D and E of the FPP provide fire behavior and topography with the site plan superimposed. 6) The evacuation plan will address this question regarding route vulnerability and contingency planning, per the CPEP content outline provided in Response to Comment O-15-5. 7) The evacuation plan will address scenarios such as a fire ignition at SR-94 and fire spread rate to the Project per the Response to Comment O-15-5 CPEP outline. 8) There are no identified areas of the Project that could not be responded to during a wildfire identified at this time. As the evacuation plan is prepared, fire agencies will provide input regarding this aspect of fire protection. 9) Radiant and convective heat are consistent with the fuel models used for each fuel type. These measures of heat produced by a wildfire have been accounted for by the fuel modification zones (Table 1, Section 3.2.1 Project FPP – Dudek 2015) and the many opportunities to retreat within the development to temporary refuge areas, which will be further addressed in the evacuation plan. 10) There are an estimated 7.5 miles of WUI associated with the Project. 11) The evacuation plan will address safety zones and escape routes at the Project site as provided input by the fire authority having jurisdiction. 12) There are 44 cul-de-sacs in the Project. There are an estimated five cul-de-sacs on the periphery of the Project that would require a limited number of residence owners to drive in the general direction of Santa Ana winds. However, these cul-de-sac roads are provided extensive fuel modification or are internal to the development. All other cul-de-sacs traverse away from Santa Ana winds or are well-within the development as to not be exposed to an offsite-adjacent fire. 13) Many of the residential units in the northern portions of the Project are situated at the top of moderate slopes. 14) No units sit at the top of a classically defined fire chimney. 15) Alternatives result in similar unit counts for each category. 16) BehavePlus worksheets were not provided, but the inputs to the BehavePlus modeling are provided in Appendix C of the FPP, which is included as Appendix C-21 of the FEIR, and the runs can be re-created with the information provided. As a note, a new FPP has

been prepared for the new Alternative H and was included in the 2019 Recirculation Package as Appendix D-21.

O-15-7 The County agrees that different fire behavior modeling inputs can have meaningful influence on outputs. That is why the County requires that pre-defined inputs be used to represent a true extreme condition. Further, conditions during the Cedar Fire in 2003 were used to capture an actual extreme fire event weather scenario. The FPP is accurate when it states that Fire Behavior modeling results are variable and provide an average fire behavior, and that there can be variations due to site and weather factors (FPP Appendix C, page C-1, Dudek 2015). It is accurate at predicting the anticipated conditions given inputs. The distances provided for safe distances from radiant heat and convective heat transfers of 4x flame lengths are for direct exposure in the open air. Roads are not designed for late evacuations. Roads are not provided 200 feet of vegetation conversion anywhere in San Diego County's WUI areas. Roads are provided enough fuel modification to minimize the likelihood of ignitions along the roadway that can spread into the wildlands.

The evacuation plan prepared for this Project will complement County OES goal of early evacuations and moving people out of targeted areas well before a fire encroaches. If fire initiates close to the Project under extreme conditions, the evacuation plan will provide for contingency options, which will be available given the size of the Project and the temporary refuge areas that would be available, as well as the ability to move people or targeted neighborhoods to the east or west within the Project or offsite. Based on these factors, the County disagrees with the comment's approach to evaluating convective and radiant heat effects and how fire protection planning is provided for roadways.

O-15-8 See Responses to Comments A-4-149, O-15-2, O-15-5, and O-15-7 for additional information regarding evacuation.

O-15-9 While the evacuation details will be analyzed in the CPEP, that analysis is not necessary for this EIR. The evacuation analysis will include a contingency plan should evacuation be considered unsafe; however, it must be clear that the Resort Village is not a shelter-in-place community. It has been designed to include many features of a shelter-in-place community but will take a different approach to contingency planning should an early evacuation not be possible and will focus on temporary refuge onsite for portions of the Project population. The Project, like any new, master planned community, will be built to the latest ignition-resistant codes and, because it will provide water, fuel modification, access, and large areas of converted fuels, would present many options for safely evacuating, relocating, or temporarily moving persons to pre-determined temporary refuge areas. See Responses to Comments A-4-149, O-15-2, O-15-5, O-15-6, and O-15-7 for additional details.

O-15-10 The County agrees with the comment that the rate at which fire spreads varies by terrain, fuels, and weather conditions. Further, the County concurs with the comment that spotting in front of a fire will also vary and is difficult to predict its overall impact to fire spread. The modeling provided in the FPP is standard analysis and focuses on the fuels directly adjacent the Project, which would produce the flames nearest the Project's structures. The Project's FPP conducts a thorough analysis of the anticipated fire behavior in the vicinity of the Project and provides required and customized fire protection and mitigation features to address the anticipated fire behavior in the area. The evacuation plan prepared for this Project will provide additional details regarding evacuation time, trigger thresholds, regional fire spread modeling, likely scenarios, and contingency options.

O-15-11 The County agrees with the comment that there is one route to the west on Otay Lakes Road and that it is possible that fire could impact an evacuation to the west. Note, however, that there is also an evacuation route to the east on Otay Lakes Road that would provide a second possible means of escape from fire. The County requirement for secondary access has been met and includes wildfire considerations as well as considerations for other potential natural or man-made disasters/emergency scenarios. Emergency evacuation planning considers fire and other emergency scenarios and determines an appropriate evacuation protocol. However, because each incident is unique, the evacuation protocols are limited to guidelines and actual occurrences will determine how an evacuation event is approached. The FPP provides direction on the preparation of a CPEP that will focus on early evacuation following the "Ready, Set, Go!" model and contingencies if that model is determined not applicable for a given emergency event. It is true that fire igniting along SR-94 could, in a rare event, travel toward the Project within a relatively short timeline. In this case, if it is considered unsafe to implement a full evacuation, it may be determined by fire and law officials to implement a contingency approach of temporarily refuging residents onsite, and that option will be explored and detailed in the CPEP. See Responses to Comments A-4-149, O-15-2, O-15-5, O-15-6, O-15-7, and O-15-9 for additional information regarding evacuation.

O-15-12 The County appreciates the comment regarding evacuation and information regarding the Cedar Fire (2003) and its effects on Scripps Ranch. It is not a direct comparison and is inaccurate to compare Scripps Ranch, with its older and ember-vulnerable construction and vastly different landscape (large eucalyptus forest) and terrain, with that of the Resort Village. Many of the homes lost in the 200s Cedar Fire were lost due to ember penetration. That issue is being resolved by ember-resistant construction methods and requirements that will be applied in the Resort Village. With regard to other areas of Chula Vista that may need to be simultaneous evacuation, the County fire and law enforcement agencies have successfully evacuated very large numbers of people over the last 15 years in large fire events. Each event resulted in lessons learned and millions of dollars spent to resolve encountered issues. See Responses to Comments A-4-149, O-15-2, O-15-5, O-15-6, O-15-7, O-15-9, and O-15-11 for additional information regarding evacuation.

The residents of San Diego County's WUI areas will benefit from these improvements in available resources, quick fire detection and notification technology, and overall coordination of evacuation efforts to minimize the occurrence of congestion on evacuation routes. Intersections will be a focus of evacuation plans both for the Resort Village and for the greater region during a large wildfire. Regarding gridlock along Otay Lakes Road westbound during a wildfire, it is considered an unlikely event for two reasons. The first reason is evacuation would occur as long as any encroaching wildfire is a very great distance from the Project and when intersections are controlled so that large numbers of vehicles can be moved out of the area. Similarly, if traffic was heavy to the west within Chula Vista, then the evacuation process may not occur as it may be determined by law and fire officials that it would be safer to temporarily keep people in the well-protected, maintained community (as would be the decision for any newer HOA-managed community implementing current fire safety measures). The second reason is the Otay Lakes Road section between the Project and the urbanized areas of Chula Vista is a defensible area. The lake occurs on both sides of the road, terrain is flatter, and fuels are lighter. This allows aerial fire retardant drops to tie in the natural fire breaks away from the lake and enables firefighters on the ground better ability to control fire through a variety of means (pre-wetting, back-firing, handlines, dozer lines, etc.) to create an area where safe passage is enabled.

O-15-13 The comment refers to a 3-mile-long flamefront approaching the community. It is difficult to anticipate a continuous 3-mile flamefront given the patchy fuels, changes in weather, and

firefighter impacts that would occur on an approaching fire. However, even if a large fire event occurred and threatened the proposed Project, it has been built to the latest fire and building codes in San Diego County that have been shown to drastically reduce structure ignition and will include an evacuation plan, an informed population, and the ability to evacuate from the area or employ a contingency onsite refuge if it is considered by law and fire professionals unsafe to evacuate. The analysis that indicates wildfires will likely be experienced also resulted in the fire protection features provided in the FPP that mitigate the effects of those fires. See Responses to Comments O-15-5 through O-15-7 for more information regarding planned evacuations at the Resort Village.

O-15-14 The proposed Project is in essence a large safety zone for firefighters. Many areas within the proposed Project meet the definition of a safety zone by including large setbacks from native fuels. Firefighters would be able to open-air refuge onsite while fire approached the outer fuel modification zones. Firefighters would also be able to position fire engines/apparatus within the proposed Project and wait for the fire front to burn out in the proposed Project's fuel modification zones. If an unexpected event occurred that involved fire in the interior Project areas, firefighters can and will enter structures for a temporary refuge. The proposed Project provides numerous opportunities for firefighter safety.

O-15-15 The FPP acknowledges that fire under extreme weather conditions will be difficult to control. However, the FPP further explains that it is these extreme conditions that have been analyzed and that the community fire protection measures are based upon. Simply applying the latest building codes includes a significant mitigation from the effects of wildfire. These codes have been based on assessments of what worked to keep homes from burning and what did not. Additional measures provided the Project only enhance fire protection. Combined, the fire protection measures, including fuel modification, fire response and access, building ignition resistance, reliable and accessible water supply, and related fire response resources result in reduction of potential hazards to below levels of significance.

O-15-16 The comment accurately states that fuel modification alone cannot prevent structure ignition. However, in the case cited, most of the homes lost in the Freeway Complex Fire were of older construction that did not include measures to prevent ember intrusion. The successful results of fire suppression of recent fires in Southern California (2003, 2007, 2014, 2016) continue to confirm that the ignition-resistant construction features, including exterior walls, windows, doors, vents, roofs, and decks, drastically reduced the number of structures that are damaged by fire. When combined with actively managed fuel modification zones, the results indicate that communities like the Project are safe, even when exposed to wildfires (IBHS 2008).

O-15-17 The fire protection system has been designed to address the identified significant threats and mitigates the most likely avenues of ignitions, resulting in a project with low fire risk. Regarding cluster burning, it would not be expected in this community due to the layered and redundant system of fire protection already described and detailed in Sections 4.0 through 4.4.2 of the FPP. Receptive fuel beds will not occur within the site's landscape, and the structures will be ignition resistant. Should a home ignite, the possibility of a neighboring home being damaged exists but would be less likely due to interior sprinklers that would reduce fire spread or extinguish the fire, and the exterior requirements of adjacent homes (exterior walls and windows) would result in much longer timeframes before ignition. This type of domino structure burning would be more likely in older construction communities at the WUI or within reach of embers. The comment also refers to elderly or weak residents. This type of vulnerability could occur but would be a disclosure to all residents that occasional wildfires may occur in the area and there are

precautions that may need to be taken, training and drills that can help them make comfortable decisions, and the recommended action of early evacuation following "Ready, Set, Go!"

O-15-18 The County understands that people are potentially vulnerable when in their cars or standing outside during wildfire conditions, but disagrees with the comment's assertions regarding risks and evacuation from the Project. The Project FPP clearly states that early evacuation would be the preferred option. Should evacuation not be considered safe, then a contingency option may be enacted by fire and law enforcement personnel. For example, residents could be advised to remain in their homes as part of a temporary refuge contingency. In no case would residents be encouraged to remain outdoors if conditions were not suitable.

Regarding cluster burning, it would not be expected in this community due to the layered and redundant system of fire protection already described. See Responses to Comments O-15-2 through O-15-17 for specific discussion of fire protection for the Project.

The comment further suggests site reconfigurations would better protect from wildfire but provides no substantiation for an alternative. Based on the site fire risk evaluation, the proposed design, which includes managed fuel modification, ignition-resistant homes, access and water infrastructure, firefighting staging areas and access points to fuel modification and wildland areas, and ongoing maintenance will provide fire protection for the Project. The reduced fire risk is accomplished through a layered and redundant system of design features that are described fully in the FPP. Regarding the exhibit “Illustration 1, How Fire Resistant Homes Can Burn,” the illustration points out the differences of "fire resistant homes" built prior to 2007 with the most recent definition of an ignition-resistant home, as defined by State Fire Code. All of the weaknesses in the illustration are addressed through construction materials or techniques now required by the fire code. In fact, the illustration supports the construction that will be used for the Project as being ignition-resistant based on mitigating the weaknesses illustrated. For example, roofs will have no openings and will be Class A systems. Through annual inspections by a third-party fuel modification inspector, trees will not be allowed to grow too close to roofs. Building inspections at time of construction and then follow-up by the HOA over time will ensure that chimneys will include spark arrestors; gutters will be metal and covered to avoid buildup of leaf litter; dual-pane, one-pane-tempered glazing will be used in all windows; etc. Human error of allowing an open garage door or window to stay open will be mitigated through the application of interior sprinklers throughout the structure, including garages.

O-15-19 The comment provides information and opinions regarding the difficulties inherent to evacuation operations. The comment also provides information and opinions regarding firefighter casualties. See Responses to Comments O-15-2 through O-15-18 for further discussion of fire protection and evacuation. However, because the comment does not address analyses in the DEIR, no further response is required.

O-15-20 The County disagrees with the comment regarding the need for additional analysis regarding whether firefighters will decide to defend structures within the Project. Further, the comment's request that the FPP analyze firefighting expectations, describing conditions that would cause firefighters to reject assignments or retreat and use of lessons learned analysis are all beyond the scope of a CEQA-level fire risk analysis. There is no requirement to address issues in a Project FPP that are associated with whether firefighters will deploy or not . These decisions are made at a fire agency's operations level (including as part of the fire protection planning process, reviews, and comment periods) and are also part of an agency's pre-planning scenario process. These decisions are often fluid and may change during any wildfire, depending on conditions.

The Project provides a community that will be hardened against wildfire and will include many possibilities for firefighter safety and temporary refuge, should it be necessary because of the converted landscape. Conversely to the comment's indication, master planned communities account for firefighter safety zones through planning and design as well as fire agency input. Firefighter safety zones are typically identified by firefighters during a fire fight. Firefighter safety zones are typically areas away from the fire that require no further action, i.e., firefighters with protective equipment and clothing (not civilians) can go to these places and be out of harm's way. By definition, firefighter safety zones are open air areas and require larger setbacks from adjacent fuels. This would typically be in an area away from direct exposure to the WUI. Temporary refuge areas are numerous on the site and can be used by firefighters including remaining in their engines on any of the interior streets, refuging on the lee (downwind, unexposed) side of the site's structures, or entering structures for temporary refuge. This proposed Project has a large footprint that includes removal of unmaintained, wildland fuels. Areas with ignition-resistant structures provide possibilities to reduce the setback and or use temporary refuge areas for firefighter safety due to their abundance on this site. The entire interior of the proposed Project site can be considered a firefighter safety zone due to the large distances between wildland fuels and interior, low-combustibility landscapes. The commenter overlooks the multiple areas within the proposed Project that can be considered firefighter safety zones and that provide more than 4x flame length setbacks. These areas occur on streets and roads within and throughout the proposed Project.

O-15-21 See Responses to Comments O-15-18 and O-15-22 for additional details regarding why additional Project alternatives are not considered necessary for providing a defensible project.

O-15-22 The County agrees that the design features suggested in the comment would provide additional managed green space or paved surfaces between structures and the wildlands. However, available science indicates that 100 feet of managed fuel modification zone provides sufficient buffer from wildland fuels (Cohen 1995), especially for the highly ignition-resistant structures that will be built on this proposed Project. The comment suggests alternative site designs would better protect from wildfire but provides no substantiation for an alternative. Based on the proposed Project's site fire risk evaluation, the proposed design, which includes managed fuel modification, ignition-resistant homes, access and water infrastructure, firefighting staging areas and access points to fuel modification and wildland areas, and ongoing maintenance will provide fire protection for the proposed Project. The reduced fire risk is accomplished through a layered and redundant system of design features that are described fully in the FPP. With regard to recommended access changes and structure separations, the proposed Project meets the County requirements for this type of development. The ignition-resistant construction requirements and ember-resistant features and sprinklers also perform a role of preventing/minimizing structure fires and reducing the possibility of home-to-home ignitions. Therefore, no edits to the proposed Project's site plan or technical FPP or additional response is needed or required.

O-15-23 The County acknowledges this comment and is aware of the concern related to current water supply conditions for this and other proposed projects. Because the short-term water supply conditions in California can and have changed based on drought conditions and legislative decisions by the State, the EIR has been amended to include a discussion of the current drought conditions and impact on the proposed Project. Note, however, that Executive Order B-29-15 was an interim directive to reduce water consumption and expired on February 28, 2016. Further, Executive Order B-29-15 sets regional goals that do not apply to individual projects. A Water Supply Assessment and Verification Study, Appendix C-18 of the EIR, was prepared and approved by OWD in January 2014. This study concludes that it is reasonable to anticipate that

water will be available to supply the proposed Project site based on long-range supply and demand projections. See Response to Comment A-4-203.

O-15-24 The County disagrees with the comment the Water Conservation Plan is inadequate. See Responses to Comments A-3-35 and O-15-23.

O-15-25 The County acknowledges this comment but asserts that project planning must be done in accordance with applicable adopted criteria. The proposed Project is within the jurisdiction of the OWD and thus the County is required to use OWD planning criteria when preparing studies for the proposed Project. As stated in the 2009 OWD Water Resources Master Plan, medium-density residential land use was projected to have a demand of 500 gallons per day per development unit. Water Unit Duty Factors from this report were used in the Overview of Water Services Memo (Appendix C-17 of the FEIR), which was in turn used in the Residential Water Conservation Plan/ Appendix VI to the Specific Plan Amendment. Therefore, no changes have been made to the EIR or associated appendices.

O-15-26 The County is aware of the concern related to current water supply conditions for this and other proposed projects. Section 3.7.1.1 of the FEIR has been amended to include additional language related to current drought conditions. The Governor's Order (Order B-29-15), which has since expired, did not call for the stoppage of new development to meet the water use reductions. Instead the State and local suppliers put restrictions on new development to ensure that they are water efficient. The regional goals are to be addressed at the level of the water agency, not the individual project. The proposed Project has been included in the water agencies' long-range planning and is therefore taken into account when planning for the reduction of water use. The Governor's Order calls for a 25 percent reduction in per capita water use meaning that the total water use can be reduced less than 25 percent or even increase, but the targeted reduction in usage per person must decrease. To reiterate, however, the Governor's Order has expired, and no replacement order has been issued.

O-15-27 The County is unaware of any OWD residents or other residents in San Diego County that have "experienced their taps to run dry" as implied in the comment. Page 3.7-8 of the DEIR provides an adequate description of the requirements for compliance with Senate Bills 610 and 221 regarding the evaluation of project water supply requirements. The water supply and conservation data used in the DEIR is consistent with the 2010 UWMP documents prepared by OWD, SDCWA, and MWD and are based on reasonable "paper water" projections of supply and demand over a 20-year period. These agencies would be responsible for taking future conditions such as climate change into account when assessing water supply and demand.

O-15-28 The water supply projections in the DEIR are consistent with the appropriate urban water management planning documents prepared by OWD, SDCWA, and MWD. SDCWA has decreased its reliance on MWD water supplies in recent years and projects that it will only receive 30 percent of its water from MWD by the year 2020. SDCWA has also invested significantly in local supplies and has a 30-year Water Purchase Agreement with Poseidon water for the output of the Carlsbad Desalination Plant. This plant produces up to 50 million gallons per day of drinking water and represents up to 10 percent of the region's water supply needs. The plant has been delivering water to homes and businesses in San Diego County since December 2015.

O-15-29 The County acknowledges this comment but does not concur with it. The impacts of runoff to the Lower Otay Reservoir have been identified and discussed with the City of San Diego. These impacts are related to salt and nutrient loading and are considered less than significant (see

Response to Comment A-3-21). The example of the City of Seattle purchasing an entire watershed is not applicable to the Lower Otay Reservoir because development currently exists within the watershed. In addition, there are numerous projects in San Diego County located directly adjacent to a drinking water reservoir, including Rolling Hills Ranch and Eastlake in the Otay Reservoirs basin and adjacent to Lake Murray and Lake Hodges in other areas of the City of San Diego.

O-15-30 The County acknowledges this comment but does not concur with the reduction of the development footprint. The Project as planned implements the goals, objectives, and policies of the adopted Otay SRP, the Otay Ranch RMP, and the County MSCP Subarea Plan South County segment.

O-15-31 Alternative G would reduce significant impacts on biological resources. As pointed out in the EIR, the proposed Project already includes mitigation measures sufficient to reduce impacts on biological resources to less than significant levels. Therefore, selection of Alternative G is not required in order to reduce potential impacts to biological resources to less than significant levels. Furthermore, Alternative G would significantly reduce the number of residential units and would not meet the Project Objectives as identified in Section 1.1. Regarding the fire comments: The proposed Project's FPP adequately considers the fire environment and anticipated fire hazard, providing measures, many of which are County requirements, that have been shown to result in fire-adapted communities. The State of California, County of San Diego, and many other government agencies have spent decades and hundreds of millions of dollars evaluating wildfire behavior, studying why homes burn and why others do not, and developing standards for any development in high and very high fire hazard zones. These standards have resulted in substantial ignition resistance and have led to the ability to propose, approve, and construct homes in these areas. The proposed Project incorporates all of these County requirements, which address structure ignition resistance, water supply, fire access, fuel modification, quick response capabilities, and ongoing maintenance, among others, resulting in a defensible community that does not expose people or structures to a significant risk of loss, injury, or death involving wildland fires. Response to Comment O-15-22 provides additional details regarding why additional Project alternatives are not considered necessary for providing a defensible project. Response to Comment O-15-2 provides additional information in response to this comment's fire concerns. See Response to Comment O-15-29 for a discussion of the proposed Project site being adjacent to a drinking water reservoir.

O-15-32 The County disagrees that the EIR must assess the extent to which habitat within the MHPA has changed since the MSCP was approved in 1997. The County also disagrees that the MSCPs are no longer valid and cannot be used by this or any other future project in the MSCP planning area. Such a position would frustrate the entire purpose of the MSCP, which is to provide planning certainty in exchange for dedications of land to be used as a large habitat preserve.

The Otay Ranch Resource Management Plan (RMP), in conjunction with the MSCP, provides guidance for preservation of resources in the context of planned development. The Biological Resources Technical Report ,Section 3.6, page 60 states: "The regional resource planning of this area has mainly been conducted through the Otay SRP and MSCP processes. These plans are important for evaluating impacts to biological resources because the loss of resources is anticipated by these plans and compensated through the preserve assemblage that adequately conserves covered species. The Otay SRP and the Otay Ranch RMP establish the mechanism for mitigation of overall impacts related to Otay Ranch and provides for conservation and management of the entire 11,375-acre preserve. The planning for the Otay Ranch RMP has also been incorporated into the MSCP. The Otay Ranch Preserve represents an important part of the

MSCP Subarea Plan South County Segment." Specific funding for the Otay Ranch Preserve will come from the CFD program that is being created for County projects, which is comparable to the City of Chula Vista CFD. These are the most recent approved planning documents that guide development in the region. Therefore, by adhering to the guidelines and policies contained within these documents regarding covered species, the Project is not expected to reduce the likelihood of survival and recovery of these species. The comment's claim that the DEIR should have assessed whether the MSCP is adequately funded, such an analysis is beyond the scope of this DEIR and is not required under CEQA or the County Guidelines.

The Otay Ranch is unique among the projects within the MSCP in requiring the preparation of plans to address threats that potentially impact listed species. These plans include the Edge Plan that provides activities and actions to protect the Otay Ranch Preserve from indirect impacts. Additionally, the success criteria and monitoring requirements as well as the adaptive management that are part of the Otay Ranch RMP provide a greater level of protection and responsibility for action from the Preserve Owner Manager. Thus, the significance threshold for impacts to listed species and the analysis is appropriate.

O-15-33 Although the proposed Project will affect habitat suitable for burrowing owl, no burrowing owl have been observed onsite since 2000. Since this species has not been observed onsite, the management plans/directives outlined in Table 3-5 of the MSCP do not apply to the Project. The proposed Project will preserve 51 acres that could be managed for burrowing owl depending on the goals and objectives of the managing entity (Otay Ranch Preserve/POM). The County has determined that this is sufficient to offset the proposed Project's impacts to the species.

Because the burrowing owl is a Covered Species under the MSCP, impacts to its habitat have already been accounted for; additional mitigation is not required. The County disagrees that it or the applicant has disregarded or failed to meet its obligations under the MSCP as they relate to burrowing owl. Moreover, the MSCP and its Implementing Agreement provide mechanisms for addressing any extraordinary change in conditions for covered species, including burrowing owl. These mechanisms are the proper remedy for any concerns regarding the decline or feared extirpation of a species covered under the MSCP. The commenter also provides a legal opinion as to when mitigation credit, take authorization/coverage is "earned" under the MSCP. The County disagrees with that legal opinion.

O-15-34 The comment alleges that the MSCP has failed to establish a regional funding mechanism, leading to a failure to establish baseline population numbers within the planning area. MSCP funding and population studies are beyond the scope of this Project-specific EIR. However, to address the comment: specific funding for the MSCP will come from the CFD program that is being created for County projects, which is comparable to the City of Chula Vista CFD.

In addition, as stated in Response to Comment O-15-32, the MSCP and RMP provide guidance for preservation of resources as well as providing for planned development. The proposed Project adheres to the guidance and requirements set forth in those two documents. The alleged flaws in the MSCP funding mechanism, as implied by the commenter, do not raise any new issue or make any new substantive comment concerning the adequacy of the DEIR.

O-15-35 Please refer to Responses to Comments A-1-9, A-1-10, A-1-18, and O-9-2 for discussions of impacts to Quino checkerspot butterfly and proposed mitigation for those impacts. In response to the commenter's discussion of captive propagation, the proposed Project already preserves suitable habitat and associated populations of Quino checkerspot butterfly; therefore, propagation is not proposed.

O-15-36 This EIR analyzes the proposed Project's impacts on biological resources, pursuant to the requirements of CEQA. That analysis, however, need not demonstrate how the proposed Project contributes to the "recovery" of a particular species, such as those that reside in vernal pools, however in spite of that, the proposed Project provides full mitigation for impacts to vernal pools and San Diego fairy shrimp by restoration within the K8 mesa (Appendix B of the D-3 Appendix in the Recirculation Package). Nevertheless, the County disagrees that the proposed Project is inconsistent with the Recovery Criteria of the Vernal Pool Recovery plan. The most recent plan located at http://www.fws.gov/sacramento/ES/Recovery-Planning/Vernal-Pool/es_recovery_vernal-pool-recovery.htm, does not indicate that the vernal pools on the Project site are within the focus for preservation.

The County disagrees that the proposed Project does not contribute to conservation of vernal pools and will result in prohibited take. The proposed Project proposes to preserve vernal pools that were originally planned and approved to be impacted per the GDP/SRP. Due to the MSCP boundary adjustment, the pools on the K8 mesa will be conserved. The pools on the K6 mesa, of which one pool was confirmed to contain a fairy shrimp cyst, will be impacted but the proposed Project is required to address the take of the species by Section 7 Consultation or Section 10 as described on page 177 of the Biological Resources Technical Report.

As discussed in Section 6.3 of the Biological Resources Technical Report, the Otay Ranch RMP contains guidelines for preservation and, when applicable, mitigation for impacts to vernal pools. The Otay Ranch RMP was written to mitigate for biological resource impacts to satisfy CEQA and includes the requirement for providing a 100-foot buffer around the watershed, which is included for the preserved K8 pools. Otay Ranch is regulated per the Otay Ranch RMP and not the County of San Diego Biological Mitigation Ordinance.

The County agrees that actions to protect sensitive vernal pools are needed. To that end, the proposed Project would conduct surveys this season and include the results in the revised Biological Resources Technical Report; preserve and manage high-quality vernal pools; restore and enhance to reestablish vernal pool habitat; and manage and monitor the habitat and listed species as part of the Otay Ranch Preserve. Provided these actions are implemented, the Project's impacts on vernal pools and associated species will be less significant. The pools proposed to be impacted contain no sensitive species except for the documentation of one fairy shrimp cyst. In contrast, the pools originally designated for development in the GDP/SRP contain special-status species; thus, the proposed MSCP boundary adjustment preserves the pools with listed species. The vernal pools proposed for inclusion in the Otay Ranch Preserve include the watershed as well as a 100-foot buffer for protection from indirect impacts. The Otay Ranch Preserve includes funding and management by the Preserve Owner Manager. The vernal pools that are preserved are addressed by a Restoration Plan that will be reviewed and approved by the Wildlife Agencies and include success criteria, monitoring, and management.

O-15-37 The County disagrees that disturbance, edge effects, and restoration efforts could result in hybridization (assuming that the commenter means the hybridization of San Diego fairy shrimp with versatile fairy shrimp). The versatile fairy shrimp is not present within the K8 mesa. A 100-foot buffer would be provided adjacent to the watershed of onsite vernal pools and would be managed and monitored to ensure that hybridization does not occur. The County has updated the Phase II RMP, which addresses in greater detail the protection, monitoring, and restoration of vernal pools within the Preserve areas.

O-15-38 The County disagrees that vernal pools cannot be created. Documentation of successful restoration is provided for the Manzanita Partners vernal pools, the Dennery Ranch vernal pools, and the ongoing restoration for the Fry's vernal pools. Regardless, the proposed Project proposes to restore vernal pools within areas that currently contain appropriate vernal pool soils. Although it is understood that hybridization with the versatile fairy shrimp has occurred at other locations, the versatile fairy shrimp is not present within the vernal pools that are proposed to be preserved and enhanced. The Conceptual Vernal Pool Mitigation Plan includes the following tasks and provides additional details: site preparation, weed removal and control, inoculum and soil salvage, grading and mima mound creation, seeding, fencing, erosion control, maintenance, and monitoring. Target success criteria are presented in the Plan.

O-15-39 The County does not agree that the proposed Project should mitigate impacts to vernal pools at a 4:1 ratio for unoccupied pools and 8:1 for occupied pools. As discussed in Section 6.3 of the Biological Resources Technical Report (Appendix C-3) and the Biological Technical Report for Alt H (Appendix D-3),

> "The Otay Ranch RMP contains guidelines for preservation and, when applicable, mitigation for impacts to vernal pools. The Otay Ranch RMP was written to mitigate for biological resource impacts to satisfy CEQA and includes the requirement for providing a 100-foot buffer around the watershed but does not identify mitigation ratios.
>
> The County of San Diego provides mitigation ratios of 2:1 for Tier 1 habitat (includes vernal pools) but also indicates that 5:1 mitigation is required for areas outside of MSCP (County of San Diego 2008b). Because the K6 vernal pools impacted by the proposed Project are characterized as having low to moderate value, the proposed mitigation will use a 2:1 mitigation ratio for the pools not occupied by San Diego fairy shrimp and 5:1 mitigation ratio for the occupied pool. Thus 0.025 acre will mitigate for impacts to the occupied pool, and 0.214 acre will mitigate for the impacts to the unoccupied pools for a total mitigation of 0.239 acre of vernal pool basin area."

O-15-40 Please refer to Responses to Comments A-3-56 and A-4-51 for a discussion of wildlife corridors. Otay Lakes Road will remain a two-lane road along the reservoir. Mitigation measure M-BI-12 provides adequate mitigation based on the statements in Response to Comment A-3-56. The Wildlife Agencies provided thorough review of the culverts and reviewed the locations of each one in the field. The proposed Project improves the initial configuration of wildlife corridors within the Otay Ranch as analyzed under the Otay Ranch RMP. As noted in Response to Comment A-4-51, the wildlife crossings are designed to be consistent with the MSCP requirements and, as such, is additional documentation that the mitigation is adequate.

O-15-41 The County disagrees that the less than significant conclusion lacks credible support. The County has provided responses to each comment that are supported by analysis contained within the Biological Resources Technical Report and DEIR.

O-15-42 The County acknowledges and appreciates the comment. It will be included as part of the FEIR, which will be considered by the decision makers. However, the comment does not present any issue or make any substantive comment about the adequacy of the 2015 DEIR, but rather provides general information regarding recent climate trends, the cumulative attributes of GHG emissions relative to global climate change, California's statutory framework for the reduction of GHG emissions, and the climate policy goals of Governor Brown. For that reason, no further response is needed or required.

O-15-43 The comment requests that the EIR compare the capacity of the existing, onsite vegetation to absorb carbon dioxide with the post-Project conditions, opining that is "likely" that the site has "negative" GHG emissions in the existing condition (meaning that the site sequesters more carbon dioxide than it emits).In response to this comment, a technical memorandum quantifying the existing and post-Project carbon sequestration levels on the Project site was prepared (see **Appendix C-28** of the FEIR). As discussed therein, the annualized loss in onsite carbon sequestration capacity is 8 metric tons of carbon dioxide. Additionally, Section 2.10, Global Climate Change, of the 2019 Recirculation Package discloses the Project-related sequestration losses and gains; see Table 2.10-4, Summary of Project GHG Emissions. As disclosed therein, sequestration loss is estimated at 4,077 MT CO_2e/year and sequestration gain is estimated at -3,799 MT CO_2e/year.

O-15-44 The comment takes issue with the use of several methodologies in Section 3.8, Global Climate Change, of the 2015 DEIR and opines that none of them are genuine methodologies. The comment states that the only "baseline" for evaluating the significance of the Project's GHG emissions is the existing environmental setting; as such, the comment opines that Methodologies 2 through 7 in the 2015 DEIR are not "genuine methodologies." In response, Section 2.10, Global Climate Change, of the 2019 Recirculation Package supersedes and replaces the analysis provided in the 2015 DEIR. This comment is not applicable to Section 2.10, which no longer uses the same methodological construct of the 2015 DEIR. Of relevance to the comment, Section 2.10 (see page 2.10-23) concludes that, "because the recommended mitigation measures would ensure that the Project would result in no net increase in GHG emissions as compared to the existing environmental setting (see CEQA Guidelines §15064.4(b)(1)), the mitigated Project would not generate GHG emissions that may have a significant impact on the environment and the Project's GHG emissions would be reduced to a less than significant level." This analytical approach is consistent with the commenter's request that significance be determined relative to the existing environmental conditions.

O-15-45 The comment states that it is feasible and informative to determine significance based on the Project's actual net emissions in comparison to the existing environment. In response, Section 2.10, Global Climate Change, of the 2019 Recirculation Package (see page 2.10-23) "concludes that the Project's increase in GHG emissions may have a potentially significant impact on the environment (see CEQA Guidelines §15064.4(b)(1)." This conclusion is rendered because the Project would "result in an obvious change to the existing GHG emissions from the Project site," and despite the fact that "there is no scientific or regulatory consensus regarding what particular quantity of GHG emissions is considered significant, and there remains no applicable, adopted numeric thresholds for assessing the significance of a project's individual emissions as a direct impact" (see page 2.10-22).

O-15-46 The comment takes issue with the 2015 DEIR's statement that "future residents and occupants of development enabled by this Project would exist and live somewhere else even if this Project were not approved." While Section 3.8, Global Climate Change, of the 2015 DEIR has been superseded and replaced by Section 2.10, Global Climate Change, of the 2019 Recirculation Package, the observation remains. This observation is justified and accurate because it is well recognized that population growth will occur in San Diego County, the State of California, and the nation generally, irrespective of whether this proposed Project is approved. As such, and as provided by CAPCOA, land use development does not drive population growth but rather responds to population growth (see page 2.10-23):

"[A] land development project, such as a specific plan, does not necessarily create 'new' emitters of GHG, but would theoretically accommodate a greater number of residents in the state. Some of

the residents that would move to the proposed Project could already be California residents, while some may be from out of state (or would 'take the place' of in-state residents who 'vacate' their current residences to move to the proposed project). Some also may be associated with new births over deaths (net population growth) in the state. The out-of-state residents would be contributing new emissions in a statewide context, but would not necessarily be generating new emissions in a global context."

The underlying point made in the EIR's disclosure is that, because climate change is a global phenomenon, it is environmentally preferable for new land use development to occur within the State of California, which has a comprehensive regulatory framework that more aggressively controls the emission of GHGs than other portions of the nation. Further, a lack of development in San Diego County has the effect of encouraging San Diego workers to live and commute from farther distances, including Riverside County, due to supply constraints in San Diego County and the resulting price increases. The result is increased levels of GHG emissions statewide, nationwide, and globally in an effort to constrain housing development.

The comment also ignores the established fact that new development is more energy efficient and conserves more water than existing development due to the ever-increasing rigor of state regulatory standards, such as the California Green Building Standards Code (CCR, tit. 24, part 11) and California Building Energy Efficiency Standards Code (CCR, tit. 24, part 6). As such, new development has a better GHG intensity rating than existing development.

As for the comment's opinion that the construction of residential homes with larger square footages serves to encourage population growth and increase GHG emissions, CEQA is not a tool to control the "human reproductive habits" within San Diego County or the State of California, and development does not dictate population growth, but rather vice versa.

O-15-47 The comment states that Methodologies 2 and 3 in Section 3.8, Global Climate Change, of the 2015 DEIR rely on "legally impermissible comparisons" of the Project's "actual" emissions to "higher-emitting hypothetical situations or variants." In response, Section 2.10, Global Climate Change of the 2019 Recirculation Package supersedes and replaces the analysis provided in the 2015 DEIR. Section 2.10 does not utilize business-as-usual methodologies. As such, the comment is no longer applicable.

O-15-48 After repeating the previous comment regarding the need to "address the actual significance of the project's impacts on the existing environment" (see r Responses to Comments O-15-44 and O-15-45 for responsive information), the comment requests that the Project commit to the installation of additional solar infrastructure on the Project site in order to "offset the project's cumulatively significant adverse impacts to climate change."

In response, Section 2.10 of the 2019 Recirculation Package contains mitigation parameters that are relevant to this comment. More specifically, mitigation measure M-GCC-4 sets forth a requirement for single-family residential development within the Project site to achieve Zero Net Energy design, as defined by the California Energy Commission. Appendix C within Appendix C-2 of the 2019 Recirculation Package contains a "Building Analysis" prepared for the Project by ConSol. As provided therein, and as demonstrated through the application of recognized building modeling software, Zero Net Energy design is anticipated to be achieved through a combination of improvements to the building envelope design and efficiency, *and* installation of rooftop solar. The Zero Net Energy design requirement would be made enforceable via adoption of the CEQA-mandated MMRP, in the event of Project approval, and would be implemented via Zero Net

Energy Confirmation Reports prepared by qualified building energy efficiency and design consultants that would be submitted to the County for review and approval.

O-15-49 The comment objects to the absence of onsite transit service and questions the effectiveness of the proposed Project's bicycle and pedestrian modes, noting that Alternative G more effectively facilitates the utilization of non-vehicular travel modes. The County acknowledges the comment's support for Alternative G. Also, while the comment correctly notes that the Project site currently is not served by transit, the Project incorporates various design features to reduce mobile source-related GHG emissions. For example, the Project's land use plan locates a school, parks, and commercial land uses in proximity to residential areas to encourage pedestrian and bicycle travel. Relatedly, the Project's trail and pathway system enables non-vehicular travel routes to these destinations. The Project also includes multiple transportation demand management (TDM) strategies designed and intended to reduce total vehicle miles traveled.

O-15-50 The comment proposes additional mitigation for the reduction of proposed Project-related GHG emissions. In response, Section 2.10, Global Climate Change, of the 2019 Recirculation Package contains eight mitigation measures (M-GCC-1 through M-GCC-8) for the reduction of GHG emissions. Many of those mitigation measures advance the same or similar building energy efficiency concepts set forth in this comment (see M-GCC-2 through M-GCC-5).

Further, as provided in EIR Subsection 3.2.2.2, Water Quality, the Project includes 795 acres of disturbed/developed areas, approximately 321 acres (40 percent) of which is considered impervious surfaces (e.g., rooftops and pavement). This equates to an overall impervious area of approximately 16.75 percent of the 1,917-acre Project area. Where feasible, the Project would minimize directly connected impervious areas where landscaping is proposed and would direct runoff from rooftops, impervious parking lots, sidewalks, walkways, and patios into adjacent landscaping or pervious/natural drainage swales.

EIR Subsection 3.2.2.2 also provides that in compliance with the County's Model Landscape Ordinance, the Project will include drought-tolerant, low water use landscaping in all common areas, parkways, and—where feasible—in public and community spaces.

As discussed in EIR Section 2.8, Solid Waste, the first-time homebuyers of the single-family residences will be provided educational information as part of the New Homebuyer Package to inform residents about recycling, composting, and other practices that effectively reduce the amount of solid waste going to landfills. Additionally, Project-wide curbside recycling for single-family, multi-family, resort, school, commercial, and retail establishments will be provided.

O-15-51 The County agrees that the alternatives that involve consolidating the proposed Project and reducing the density of Project development would reduce visual and aesthetic impacts. However, these alternatives would still result in significant impacts to visual and aesthetic resources, as the Project site would be changing from undeveloped land to developed land, as shown in Table 4.0-1 of the EIR. Additionally, these alternatives would not meet all of the established Project Objectives, and would not necessarily reduce impacts to all other issue areas. Selection of alternatives is discussed in the Findings of Fact and Statement of Overriding Considerations.

O-15-52 The County acknowledges and appreciates the comment. It will be included as part of the FEIR, which will be considered by the decision makers. However, the comment provides concluding remarks and does not raise any new issue or include any new substantive comment concerning the adequacy of the DEIR. For that reason, the County provides no further response to this comment.

O-15-53 The County acknowledges and appreciates the inclusion of resumes and qualifications. They will be included as part of the FEIR. However, this does not raise any new issue or include any new substantive comment concerning the adequacy of the DEIR. For that reason, the County provides no further response to this comment.

O-15-54 The commenter provides a list of exhibits that do not provide any comment about the adequacy of the DEIR. Therefore, no further response is needed or required.

O-15-55 The commenter provides a list of exhibits and resumes associated with appendices that do not provide any comment about the adequacy of the DEIR. Therefore, no further response is needed or required. While the County appreciates the credentials of those referenced here, the County is also expert and relies on consultants and other experts with the necessary qualifications to analyze proposed Project impacts. It is allowable under CEQA to have disagreements between experts.